

JASON FRIERSON
United States Attorney
Nevada Bar Number 7709
LAUREN M. IBANEZ
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6336
Lauren.Ibanez@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA AARON JAMES,

Defendant.

2:23-cr-00150-JCM-EJY

**STIPULATION TO CONTINUE
CONFIDENTIAL INFORMANT
DISCLOSURE DATE**

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, through Lauren Ibanez, Assistant United States Attorney, representing the United States of America, and Nisha Brooks-Whittington, counsel for defendant Joshua Aaron James, that the government's deadline to produce Confidential Informants discovery is extended to January 10, 2025.

This Stipulation is entered into for the following reasons:

1. On April 10, 2024, the defendant filed a motion to compel disclosure of confidential informants (ECF No. 72). The government filed a response (ECF No. 76) on April 24, 2024.

2. On June 24, 2024, the Court issued an Order (ECF No. 83) requiring the government to produce certain Confidential Informant discovery thirty (30) days before

1 trial, which at that time was August 9, 2024, as trial was set for September 9, 2024.

2 3. On July 22, 2024, defendant filed a stipulation to continue motion deadlines
3 and trial dates (ECF No. 85). The trial was reset for November 18, 2024 (ECF No. 87).

4 4. On August 6, 2024, the government filed an unopposed motion to continue
5 the deadline to produce Confidential Informant discovery (ECF No. 88). The deadline was
6 continued to October 18, 2024 (ECF No. 28).

7 5. On September 30, 2024, the defendant filed a stipulation to continue motion
8 deadlines and trial dates (ECF No. 107). The trial was reset for February 10, 2025 (ECF No.
9 108).

10 6. The parties agree to the continuance of the disclosure date for Confidential
11 Informants discovery to January 10, 2025, thirty (30) days before the current trial setting.

12 7. The requested discovery deadline complies with the Court's June Order (ECF
13 No. 83).

14 8. The additional time requested herein is not sought for purposes of delay, but
15 rather to allow the government to comply with the Court's Order to disclose thirty days before
16 trial.

17 9. Additionally, denial of this request for continuance could result in a miscarriage
18 of justice. To the extent it is applicable, the additional time requested by this Stipulation is
19 excludable in computing the time within which the trial herein must commence pursuant to
20 the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the

21 ...

22 ...
23 ...
24

factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

DATED this 17th day of October, 2024

JASON M. FRIERSON
United States Attorney

By: /s/ Lauren M. Ibanez
LAUREN M. IBANEZ
Assistant United States Attorney

By: /s/ Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON
Counsel for Defendant

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSHUA AARON JAMES,

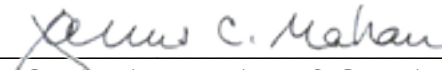
7 Defendant.

2:23-cr-00150-JCM-EJY

ORDER

8 Based on the pending Stipulation between the government and defense, and good
9 cause appearing therefore, IT IS HEREBY ORDERED that government's deadline to
10 produce Confidential Informant discovery is extended to January 10, 2025.

11
12 DATED October 18, 2024.

13
14 
15 HONORABLE JAMES C. MAHAN
16 UNITED STATES DISTRICT COURT JUDGE
17
18
19
20
21
22
23
24